

**UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION**

In re:

City of Detroit, Michigan,
Debtor.

Bankruptcy Case No. 13-53846

Judge Thomas J. Tucker

Chapter 9

**STIPULATION FOR RESOLUTION OF OBJECTION TO CLAIM
NUMBER 2780 AND WITHDRAWAL OF CLAIM NUMBER 2780**

Thomas M. Nunley (“Nunley”) and the City of Detroit, Michigan (“City,” and with Nunley, the “Parties”), by and through their undersigned counsel, state as follows in support of the entry of the *Order Resolving Objection to Claim Number 2780 and Withdrawal of Claim Number 2780* attached hereto as Exhibit 1.

1. On February 21, 2014, Nunley filed proof of claim number 2780 (the “Claim”) in the amount of \$28,724.24, asserting that it arose out of an “improper water/sewer bill that became an improper tax assessment.”

2. On April 23, 2015, the City filed its *Debtor’s Fifteenth Omnibus Objection to Certain Claims (No Basis Claims)* (the “Objection,” Doc. No. 9739).

3. On May 20, 2015, the Parties stipulated to adjourn Nunley’s response date to the Objection and the hearing on the Objection. (Doc. No. 9852.) The Court granted this request and a series of subsequent requests to allow the Parties time to reach a consensual resolution regarding the Claim and the Objection as to

the Claim. Most recently, the Court entered an order adjourning the hearing on the Objection to the Claim to August 31, 2016. (Doc. No. 1278.)

4. The Parties have reached a resolution and executed a settlement agreement effective as of July 5, 2016. The settlement agreement resolves both the Claim and the Objection to the Claim.

WHEREFORE the Parties respectfully request that the Court enter an order in the form attached hereto as Exhibit 1, resolving the Objection as regards the Claim and withdrawing and expunging the Claim.

Stipulated and agreed to on July 14, 2016:

WHEELOCK PC

By: /s/ Joshua Wheelock
Joshua Wheelock (P76512)
16400 N. Park Drive, Ste. 112
Southfield, MI 48075-4726
Phone: 248.996.8127
jwheelock@wheelocklegal.com

Counsel for Thomas M. Nunley

MILLER CANFIELD PADDOCK &
STONE, PLC

By: /s/ Marc N. Swanson
Marc N. Swanson (P71149)
150 West Jefferson, Suite 2500
Detroit, Michigan 48226
Telephone: (313) 496-7591
Facsimile: (313) 496-8451
swansonm@millercanfield.com

Counsel for the City of Detroit,
Michigan

EXHIBIT 1

**UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION**

In re:

City of Detroit, Michigan,

Debtor.

Bankruptcy Case No. 13-53846

Judge Thomas J. Tucker

Chapter 9

**ORDER APPROVING STIPULATION RESOLVING OBJECTION TO
CLAIM NUMBER 2780 AND WITHDRAWING CLAIM NUMBER 2780**

This matter having come before the Court on the *Stipulation for Resolution of Objection to Claim Number 2780 and Withdrawal of Claim Number 2780* (the “Stipulation”); the parties having entered a settlement agreement and having stipulated to the withdrawal of claim number 2780 and the resolution of the *Debtor’s Fifteenth Omnibus Objection to Certain Claims (No Basis Claims)* (the “Objection,” Doc. No. 9739) as to claim number 2780; and the Court being otherwise fully informed:

IT IS HEREBY ORDERED THAT:

1. The Objection is resolved as to proof of claim number 2780 filed by Thomas M. Nunley (the “Claim”).
2. The Claim is withdrawn and expunged.
3. The City’s claims and noticing agent, Kurtzman Carson Consultants, is authorized to update the claims register to reflect the terms of this order.